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June 14, 2022

**VIA ECF**

Honorable Paul G. Gardephe  
United States District Court Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Luis Jaime v. Captain Kirkland et al., 20-CV-4365 (PGG) (VF)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants Captain Kirkland, Captain Morales, Captain Phillips, and Chief Jennings. The parties are in discussions regarding plaintiff withdrawing some claims without prejudice. As such, defendants request an extension of time for defendant's motion for summary judgment, to which plaintiff consents. The parties will submit within thirty days, or by July 14, 2022, a stipulation withdrawing claims and a revised proposed briefing schedule for defendants' motion for summary judgment regarding plaintiff's remaining claims, if any.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch  
*Senior Counsel*

cc: **VIA ECF**  
Samuel DePaola, Esq.  
Sim & DePaola, LLP  
*Attorney for Plaintiff*

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

**Paul G. Gardephe, U.S.D.J.**

**Dated: June 17, 2022**